

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Petition for Rulemaking of the Fixed)	
Wireless Communications Coalition for)	File No. RM-11664
Service Rules for the Fixed Service)	
in the 41.0-42.5 GHz Band)	

REPLY COMMENTS OF THE GLOBAL VSAT FORUM

The Global VSAT Forum (“GVF”)¹ hereby submits these reply comments in support of the comments of the Satellite Industry Association (“SIA”) filed in response to the above-captioned Petition for Rulemaking of the Fixed Wireless Communications Coalition (“FWCC”).² GVF agrees with SIA that the Petition is unjustifiably adverse to Fixed-Satellite Service (“FSS”) operations in the 41.0-42.0 GHz band and should be denied.

In its Petition, the FWCC requests a proceeding to establish service rules for the Fixed Service (“FS”) in the V-band, including in the 41.0-42.0 band designated primarily for the FSS under the “soft segmentation” approach adopted internationally by the International Telecommunication Union and domestically by the Commission.³ Because the 41.0-42.0 GHz band can support the types of ubiquitous user terminals that are essential to VSAT networks,

¹ GVF is the international non-profit association of the VSAT community, comprised of more than 200 members from every major region of the world and from every sector of the industry, including satellite operators, manufacturers, system integrators and other service providers. A complete list of GVF members is available at www.gvf.org/about-gvf/membersdirectory.html.

² Petition for Rulemaking, RM-11664 (filed May 9, 2012) (the “Petition”).

³ The FWCC asserts that it is seeking a “restart” of a pending rulemaking proceeding, implying that the proceeding addresses FS operations at 41.0-42.0 GHz. However, as the SIA notes in its comments, the pending proceeding did not propose service rules for the FS in the 41.0-42.0 GHz band. See Opposition of the Satellite Industry Association, RM-11664 (filed July 9, 2012) at 4-5 (“SIA Comments”).

GVF is especially concerned with any effort to curtail or compromise the favored regulatory treatment of the FSS in the band. Such efforts must be viewed by the Commission with a very high level of skepticism.

SIA offers several compelling reasons why the FWCC's Petition should be rejected, all of which GVF supports. Most importantly, the FWCC offers no specifics as to how FS operations in the 41.0-42.0 GHz band will protect present and future FSS operations.⁴ This is a critical shortcoming. Significant technological obstacles prevent high-density FS from operating in the same band with high-density FSS. Indeed, the overwhelming body of technological work leaves no doubt that ubiquitous terrestrial services and ubiquitous satellite services cannot coexist in the same spectrum. Given the numerous spectrum alternatives available to the wireless industry – another cogent point raised by SIA – it is patently unnecessary to open up the 41.0-42.0 GHz band for the level of FS operations envisioned by the FWCC.

In sum, GVF urges the Commission to heed the comments of the Satellite Industry Association and deny the Petition for Rulemaking of the FWCC.

GLOBAL VSAT FORUM

By:



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⁴ See SIA Comments at 3. The comments filed in support of the FWCC's Petition likewise sidestep the issue of FSS protection. The Wireless Internet Service Providers Association ("WISPA") only offers its view that "[t]hrough the development of a complete record, the Commission can craft rules that will efficiently license and promote non-interfering use of the band." Comments of the Wireless Internet Service Providers Association, RM-11664 (filed July 9, 2012) at 3. To the contrary, the established record already confirms that the co-existence of ubiquitous FS and FSS operations is not feasible.

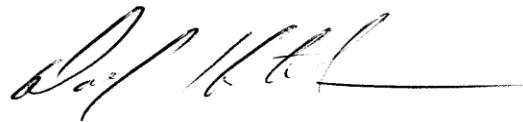
CERTIFICATE OF SERVICE

I, David Hartshorn, hereby certify that on this 24th day of July, 2012, a copy of the foregoing Opposition of the Satellite Industry Association is being sent via first class, U.S. Mail, postage prepaid, to the following:

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